

**UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF PUERTO RICO**

	-----	X
	:	
In re:	:	
	:	
THE FINANCIAL OVERSIGHT AND	:	PROMESA
MANAGEMENT BOARD FOR PUERTO RICO,	:	Title III
	:	
as representative of	:	Case No. 17-BK-3283 (LTS)
	:	
THE COMMONWEALTH OF PUERTO RICO <i>et al.</i> ,	:	(Jointly Administered)
	:	
Debtors. ¹	:	
	:	
	-----	X

**INFORMATIVE MOTION OF OFFICIAL COMMITTEE
OF UNSECURED CREDITORS IN COMPLIANCE WITH ORDER
REGARDING PROCEDURES FOR ATTENDANCE AND PARTICIPATION
AT AUGUST 9-10, 2017, OMNIBUS HEARING**

To the Honorable United States District Court Judge Laura Taylor Swain:

The Official Committee of Unsecured Creditors of the Commonwealth of Puerto Rico (and other title III debtor(s) (if any) for which it acts as the official committee of unsecured creditors) (the “Committee”) hereby submits this informative motion in response to the Court’s *Order Regarding Procedures for Attendance, Participation and Observation of August 9-10, 2017, Omnibus Hearing*, dated August 1, 2017 [No. 837] and respectfully states as follows:

1. Luc A. Despina and G. Alexander Bongartz of Paul Hastings LLP will appear in person on behalf of the Committee at the August 9-10, 2017 omnibus hearing (the “Hearing”) in

¹ The Debtors in these Title III Cases, along with each Debtor’s respective Title III case number listed as a bankruptcy case number due to software limitations and the last four (4) digits of each Debtor’s federal tax identification number, as applicable, are the (i) Commonwealth of Puerto Rico (Bankruptcy Case No. 17 BK 3283-LTS) (Last Four Digits of Federal Tax ID: 3481), (ii) Employees Retirement System of the Government of the Commonwealth of Puerto Rico (“ERS”) (Bankruptcy Case No. 17 BK 3566-LTS) (Last Four Digits of Federal Tax ID: 9686), (iii) Puerto Rico Highways and Transportation Authority (“HTA”) (Bankruptcy Case No. 17 BK 3567-LTS) (Last Four Digits of Federal Tax ID: 3808), and (iv) Puerto Rico Sales Tax Financing Corporation (“COFINA”) (Bankruptcy Case No. 17 BK 3284) (Last Four Digits of Federal Tax ID: 8474).

Courtroom 3 of the United States District Court for the District of Puerto Rico, and address, as necessary, the following matters:

- (a) *Revised Motion of Debtors for Order Approving Stipulation Providing Procedure to Resolve Commonwealth-COFINA Dispute* [Docket No. 718];
- (b) *Application for Order, Pursuant to Bankruptcy Code Section 1103(a) and Local Bankruptcy Rule 2014-1(e) Authorizing Employment and Retention of Paul Hastings LLP as Counsel to Official Committee of Unsecured Creditors, Effective as of June 26, 2017* [Docket No. 610];
- (c) *Application of Official Committee of Unsecured Creditors of Commonwealth of Puerto Rico for Entry of Order Authorizing Employment and Retention of Zolfo Cooper, LLC as Financial Advisor Effective as of June 27, 2017* [Docket No. 615];
- (d) *Motion of Official Committee of Unsecured Creditors for Order, Under Bankruptcy Code Sections 105(a), 107(b), 1102(b)(3) and 1103 and Bankruptcy Rule 9018, (I) Clarifying Scope of and Establishing Procedures in Connection with Creditor Access to Information and (II) Retaining Prime Clerk LLC as Information Services Agent in Connection Therewith* [Docket No. 690];
- (e) *Motion of Debtors Pursuant to PROMESA Section 317 and Bankruptcy Code Section 105(a) for Entry of Order Setting Procedures for Interim Compensation and Reimbursement of Expenses of Professionals* [Case No. 17-3283, Docket No. 716];
- (f) *Motion for Relief from Automatic Stay* [Case No. 17-3567, Docket No. 180]
 - *Limited Joinder of Official Committee of Unsecured Creditors to Objection of Puerto Rico Highways and Transportation Authority to*

Motion for Relief from Automatic Stay Filed by South Parcel of Puerto

Rico, S.E. [ECF No. 180] [Docket No. 220];

(g) *Motion Requesting Appointment of Additional Committee of Government*

Employees and Active Pension Plan Participants or, in the Alternative, for the

Reconstitution of the Retiree Committee [Case No. 17-3283, Docket No. 692]

- *Omnibus Objection of Official Committee of Unsecured Creditors to Motions of University of Puerto Rico Retirement System Trust and Ad Hoc Puerto Rico Municipalities Committee Requesting Appointment of Additional Official Creditors' Committees [Docket No. 810];*

(h) *Ad Hoc Puerto Rico Municipalities Committee's Request for Order Pursuant to*

48 U.S.C. § 2161 and 11 U.S.C. 1102 Directing Appointment of Official Puerto

Rico Municipalities Committee [Case No. 17-3283, Docket No. 709]

- *Omnibus Objection of Official Committee of Unsecured Creditors to Motions of University of Puerto Rico Retirement System Trust and Ad Hoc Puerto Rico Municipalities Committee Requesting Appointment of Additional Official Creditors' Committees [Docket No. 810];*

(i) *Motion of General Obligation Bondholders to Reconstitute Official Committee of*

Unsecured Creditors Pursuant to 11 U.S.C. §§105(a) and 1102(a)(4) [Case No.

17-3283, Docket No. 694]

- *Objection of Official Committee of Unsecured Creditors to Ad Hoc Group of General Obligation Bondholders' Motion to Reconstitute Committee Under Bankruptcy Code Sections 105(a) and 1102(a)(4) [Docket No. 824];*

- (j) *Motion of Official Committee of Unsecured Creditors for Leave to Intervene Under Bankruptcy Rule 7024 [Assured Guaranty Corp. et al. v. The Commonwealth of Puerto Rico, et al., Adv. Proc. No. 17-00125, Docket No. 37];*
- (k) *Motion of Official Committee of Unsecured Creditors for Leave to Intervene Under Bankruptcy Rule 7024 [Peaje Investments LLC v. Puerto Rico Highways and Transportation Authority, et al., Adv. Proc. No. 17-00151, Docket No. 124; Adv. Proc. No. 17-00152, Docket No. 116];*
- (l) *Motion of COFINA Senior Bondholders' Coalition for (I) Modification of Order Granting Interpleader, or (II) in Alternative, Clarification of Interpleader Memorandum Opinion and Intervention Denial Order [Adv. Proc. No. 17-00133, Docket No. 290]*
 - *Informative Motion of Official Committee of Unsecured Creditors Requesting to Be Heard at August 9-10, 2017 Hearing with Respect to Motion of COFINA Senior Bondholders' Coalition for Modification of Interpleader Order and Related Pleadings [Docket No. 310];*
- (m) *Informative Motion of Official Committee of Unsecured Creditors Regarding Applicability of Bankruptcy Rule 2019 to Title III Cases and Further Proposed Amendment to Case Management Order [Case No. 17-03283, Docket No. 850]*
(to the extent the Court intends to address matters related to its Order Regarding the Applicability of F.R.B.P. 2019 to the Title III Cases and a Further Proposed Amendment to the Case Management Order [Docket No. 754]);
- (n) Any statements made by any party in connection with the title III cases or any adversary proceeding pending therein.

WHEREFORE, the Committee respectfully requests that the Court take notice of the above.

Dated: August 7, 2017
San Juan, Puerto Rico

/s/ G. Alexander Bongartz

PAUL HASTINGS LLP
Luc. A. Despins, Esq. (*Pro Hac Vice*)
Andrew V. Tenzer, Esq. (*Pro Hac Vice*)
Michael Comerford, Esq. (*Pro Hac Vice*)
G. Alexander Bongartz, Esq. (*Pro Hac Vice*)
200 Park Avenue
New York, New York 10166
Telephone: (212) 318-6000
lucdespins@paulhastings.com
andrewtenzer@paulhastings.com
michaelcomerford@paulhastings.com
alexbongartz@paulhastings.com

*Proposed Counsel to the Official Committee of
Unsecured Creditors*

- and -

/s/ Juan J. Casillas Ayala

CASILLAS, SANTIAGO & TORRES LLC
Juan J. Casillas Ayala, Esq., USDC - PR 218312
Diana M. Batlle-Barasorda, Esq., USDC - PR 213103
Alberto J. E. Añeses Negrón, Esq., USDC - PR 302710
Ericka C. Montull-Novoa, Esq., USDC - PR 230601
El Caribe Office Building
53 Palmeras Street, Ste. 1601
San Juan, Puerto Rico 00901-2419
Telephone: (787) 523-3434
jcasillas@cstlawpr.com
dbatlle@cstlawpr.com
aaneses@cstlawpr.com
emontull@cstlawpr.com

*Proposed Replacement Local Counsel to the Official
Committee of Unsecured Creditors*